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4. The alleged incident giving rise to Plaintiff's complaint occurred at the intersection of Interstate 57 and Campground Road in the County of Jefferson, State of Illinois. (See "Exhibit A," General Allegations).

5. Defendant, JOHN FABICK TRACTOR COMPANY, is incorporated in Missouri and has its principal place of business in Fenton, Missouri. (See Missouri Secretary of State Corporation Registration Detail attached hereto as "Exhibit B").

6. Defendant, HOBERT CHAD WOODS, is a resident of Kentucky, residing in Mayfield, Kentucky.

7. Based upon information and belief, Plaintiff is an Illinois resident.

8. Defendants, HOBERT CHAD WOODS and JOHN FABICK TRACTOR COMPANY, are the only defendants in this action and both defendants consent to removal. (See Affidavit of Barry Klinckhardt attached hereto as "Exhibit C").

9. Plaintiff's Complaint identifies that, as a result of the subject occurrence, Plaintiff sustained severe and permanent bodily injuries with damages in excess of \$50,000.

10. Though negligence, causation, and the nature and extent of Plaintiff's injuries will be disputed, based upon information and belief, the parties' understanding of Plaintiff's medical expenses, as well as Plaintiff's policy limits demand, the matter in controversy exceeds \$75,000.

11. For the foregoing reasons, this court has original subject matter jurisdiction based upon diversity jurisdiction pursuant to 28 U.S.C. §1332(a), as this is a civil action between citizens of different states where the matter in controversy exceeds the sum or value of \$75,000.

12. The undersigned has been retained to represent the defendants, HOBERT CHAD WOODS and JOHN FABICK TRACTOR COMPANY, and said defendants seek removal of this

action from the Circuit Court of Cook County to the United States District Court for the Northern District of Illinois.

13. Defendants, HOBERT CHAD WOODS and JOHN FABICK TRACTOR COMPANY demand a trial by jury.

WHEREFORE, the defendants, HOBERT CHAD WOODS and JOHN FABICK TRACTOR COMPANY, move this court in accordance with the foregoing.

Respectfully submitted,

ARNETT LAW GROUP

/s/ Daniel J. Arnett

Attorneys for Defendants, HOBERT CHAD
WOODS and JOHN FABICK
TRACTOR COMPANY

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CERTIFICATE OF SERVICE

I hereby certify, under penalty of perjury, that, on the _____ day of _____ 2019, I filed a copy of the foregoing Notice of Removal using the Court's CM/ECF Electronic Case Filing system which will send notification to the following, in addition to service of the foregoing via US Mail and via email delivery:

Andrew Kryder
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/s/ Bonnie Piet
Bonnie Piet,
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and Joseph Homsy